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November 6, 2003

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Federal Communications Commission
Office of Secretary

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-B204
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: Revision of the Commission's Rules to Ensure Compatibility
with Enhanced 911 Calling Systems
CC Docket No. 94-102
Ex Parte Communication**

Dear Ms. Dortch:

On behalf of NEC America, Inc. ("NEC") and pursuant to Section 1.1206(b) of the Commission's rules, I am writing to inform you of a series of ex parte meetings and/or communications with Commission staff on November 4-6, 2003 to discuss issues raised in the above-referenced proceeding.¹ Commission staff involved in such meetings and/or communications include Chris Libertelli, Senior Legal Advisor to Chairman Powell; Matthew Brill, Senior Legal Advisor to Commissioner Abernathy; Lisa Zaina, Senior Legal Advisor to Commissioner Adelstein; Sam Feder, Legal Advisor to Commissioner Martin; Jessica Rosenworcel, Legal Advisor to Commissioner Copps; Paul Margie, Legal Advisor to Commissioner Copps; Michelle Carey, Chief of the Competition Policy Division of the Wireline Competition Bureau; Scott Bergmann, Legal Counsel to the Chief of the Wireline Competition Bureau and Marcy Greene, Attorney Advisor in the Competition Policy Division of the Wireline Competition Bureau. Participants on behalf of NEC include Paul Weismantel, Director of Marketing and Sales of Corporate Network Solutions for NEC, and the undersigned of Hogan & Hartson L.L.P.

¹ See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Further Notice of Proposed Rulemaking*, FCC 02-326 (rel. Dec. 20, 2002) ("*Further Notice*").

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Ms. Marlene H. Dortch
November 6, 2003
Page 2

In the ex parte meetings and communications, NEC reiterated the recommendations made in its comments and reply comments in this proceeding. First, NEC urged the FCC to adopt NENA's proposal to require that LEC central offices be provisioned to permit connection of MLTS equipment for E911 purposes "in any accepted industry standard format, as defined by the FCC, requested by the MLTS operator." In connection with this recommendation, NEC suggested that the Commission adopt the ANSI T1.628-2000 ISDN network interface standard as an "accepted industry standard," thereby requiring LECs to enable MLTS operators to use a more efficient means of interfacing with the network than is currently available in most instances. Without this provision, many MLTS operators will continue to be forced to incur the cost of purchasing direct inward dial ("DID") numbers strictly for E911 purposes, despite the fact that their existing ISDN service could eliminate this cost if the LEC switch could accept the updated ISDN network interface standard.

Second, NEC requested that the Commission require LECs with responsibility over ALI database management to permit direct MLTS operator updates of the ALI database. Direct MLTS operator access to the ALI database would reduce MLTS operators' ALI database management costs and reduce the delays associated with updating such databases when employees change their physical locations within an office setting but keep their existing telephone numbers. There is no technical or policy reason why MLTS operators should not be able to provide direct entry of database updates through the use of existing data transfer protocols.

Finally, NEC explained that in the wireless MLTS context, technical challenges continue to exist that make it infeasible at this time to provide reliable location information to the PSAPs.

HOGAN & HARTSON LLP

Ms. Marlene H. Dortch
November 6, 2003
Page 3

An original and one copy of this notice are provided for your reference.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ari Q. Fitzgerald', with a large, stylized flourish extending from the end of the signature.

Ari Q. Fitzgerald
Counsel for NEC America, Inc.

cc: Mr. Christopher Libertelli
Mr. Matthew Brill
Ms. Lisa Zaina
Mr. Sam Feder
Ms. Jessica Rosenworcel
Mr. Paul Margie
Ms. Michelle Carey
Mr. Scott Bergmann
Ms. Marcy Greene